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# UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

THOMAS SNADER, BRAD MARKS, and WAHID SIBOU, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

JNR Incorporated,

Defendant.

Case No.: 8:22-cv-02254-FWS-ADS

JUDGE: HON. Fred W. Slaughter DEPARTMENT: Courtroom 10D COMPLAINT DATE: 12/16/2022

### STIPULATION TO EXTEND TIME TO RESPOND TO THE INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

Complaint Served: December 29, 2022 Current response date: January 19, 2023 New Response Date: February 17, 2023

DISCOVERY CUT OFF:
MOTION CUT OFF:
FSC DATE:
TRIAL DATE:
NONE

Defendant JNR, Inc., by and through its counsel, and Plaintiffs Thomas Snader, 1 Brad Marks, and Wahid Sibou, by and through their counsel, hereby stipulate to the 2 following: 3 Counsel for JNR, Inc. accepted service of the Complaint on December 1. 4 29, 2022. 5 The response to the Complaint is currently due January 19, 2023. 6 2. 3. The Parties agree to extend the date to Respond to the Complaint to 7 8 February 17, 2023, which is less than 30 days from the initial response date. 4. This is the first request to extend the date to respond to the Complaint. 9 10 IT IS SO STIPULATED. 11 12 Respectfully submitted, 13 CALLAHAN, THOMPSON, SHERMAN & DATED: January 17, 2023 14 CAUDILL, LLP 15 16 By: *s/Kathleen M. Hartman* 17 Kathleen M. Hartman Attorneys for Defendant, 18 JNR INCORPORATED 19 **BOCHETTO AND LENTZ, P.C.** 20 DATED: January 17, 2023 21 22 By: s/Ryan Kirk 23 Attorneys for Plaintiffs, HOMAS SNADER, BRAD MARKS, 24 and WAHID SIBOU 25 26 27

#### **CERTIFICATE OF SERVICE**

STATE OF CALIFORNIA )
COUNTY OF ORANGE )

I am employed in the County of Orange, State of California, I am over the age of 18 years and not a party to the within action; my business address is 2601 Main Street, Suite 800, Irvine, California.

On this date, January 17, 2023, I served the foregoing document described as:

## STIPULATION TO EXTEND TIME TO RESPOND TO THE INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

X (By electronic service) I hereby certify that on January 17, 2023, I caused a complete and accurate copy of the foregoing to be served via this Court's CM/ECF notification system, which will electronically serve all participants in this case.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on January 17, 2023, at Irvine, California.

/s/ Nancy Mercado NANCY MERCADO

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#### **SERVICE LIST** 1 : Snader, et al. v. JNR Incorporated Case Name 2 : United States District Court, Central District of California Case Number: 8:22-cv-02254-FWS-ADS 3 Kolin C. Tang Attorneys for **PLAINTIFFS** 4 MILLER SHÄH LLP 19712 MacArthur Blvd., Suite 222 5 Irvine, CA 92612 6 T: (866) 540-5505 Email: kctang@millershah.com 7 George Bochetto Attorneys for **PLAINTIFFS** Ryan Kirk 8 BOCHETTO AND LENTZ, P.C. 1524 Locus St. 9 Philadelphia, PA 19102 10 T: (215) 735-3900 F: (215) 735-2455 11 Email: gbochetto@bochettoandlentz.com 12 rkirk@bochettoandlentz.com James C. Shah Attorneys for **PLAINTIFFS**

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